

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Peter Schroeck,

Plaintiff,

v.

**AT&T Mobility LLC, Collection
Company of America, TransUnion,**

Defendants.

Civil Case No. 2:09-cv-04350-WJM-MF

**DECLARATION OF FERZANDRA
MOORE IN SUPPORT OF
DEFENDANT AT&T MOBILITY
LLC'S MOTION TO COMPEL
ARBITRATION AND STAY
LITIGATION**

DECLARATION OF FERZANDRA MOORE

I, Ferzandra Moore, hereby declare as follows:

1. The following facts are of my own personal knowledge, and if called as a witness I could and would testify competently as to their truth.

2. I am employed by AT&T Mobility LLC ("ATTM") as a Customer Service Representative in the Southeast region of the Office of the President. I am familiar with the service agreements under which ATTM provides wireless service to its subscribers and the manner in which in the regular and ordinary course of business a customer's acceptance of those agreements is recorded in ATTM's records.

3. I can provide details of plaintiff Peter Schroeck's account history based on my review of the records for his account.

4. According to ATTM's records, on August 13, 2005, Mr. Schroeck purchased a cellular phone on ATTM's (then Cingular Wireless LLC's) web site and subsequently activated the device for wireless service on ATTM's network.

5. According to ATTM's records, on January 26, 2006, Mr. Schroeck elected to receive his monthly bills online in electronic form, and he continues to receive his bills electronically.

6. Attached as Exhibits 1 through 4 are true and correct copies of selected pages from Mr. Schroeck's December 2006 through March 2007 billing statements, respectively, with some information redacted to protect Mr. Schroeck's personal information.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 19, 2009, at Ocean Springs, Mississippi.

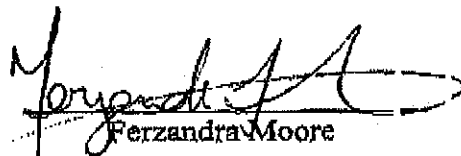

Ferzandra Moore

EXHIBIT 1



Page: 1 of 75
 Billing Cycle Date: 11/03/06 - 12/02/06
 Account Number: Redacted

How To Contact Us:

- 1-800-331-0500 or 611 from your wireless phone
- For Deaf / Hard of Hearing Customers (TTY/TDD)
1-866-241-6567

Wireless Numbers with Rollover

Redacted

Previous Balance	139.01
Payments Posted	-139.01
BALANCE	0.00
Monthly Service Charges	99.98
Usage Charges	45.79
Credits/Adjustments/Other Charges	12.21
Government Fees and Taxes	11.14
TOTAL CURRENT CHARGES	169.12
Due Dec 25, 2006	
Late fees assessed after Dec 25	
Total Amount Due \$169.12	

Text & Instant Message Pay Per Use Rate Change

Effective 1/21/07, Cingular will charge \$0.15 for text and instant messages sent or received on a pay-per-use basis. If you already subscribe to a Messaging Package or MEdia Bundle, there is no change to your rate. By purchasing a Messaging Package or MEdia Bundle, you can send and receive messages for as little as a penny. Sign up & save at www.cingular.com/getmessaging or Dial *NOW from your wireless phone.

9020 N. MAY AVE., #250 NYC
 OKLAHOMA CITY, OK 73120

#BWNHBD

Redacted

PETER SCHROECK

Redacted
SPRINGFIELD, NJ

Redacted

Return the portion below with payment
 to Cingular Wireless only.

Account Number:	Redacted
Total Amount Due:	\$169.12
Amount Paid:	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

* Please do not send correspondence with payment.

**Total Amount
 Due by Dec 25, 2006**

Please Make Check Payable To:

Cingular Wireless
 P.O. Box 537113
 Atlanta, GA 30353-7113

EXHIBIT 2



Page:
Billing Cycle Date:
Account Number:

1 of 58
12/03/06 - 01/02/07

Redacted

How To Contact Us:

- 1-800-331-0500 or 611 from your wireless phone
- For Deaf / Hard of Hearing Customers (TTY/TDD)
1-866-241-6567

Wireless Numbers with Rollover

Redacted

Previous Balance	169.12
Payments Posted	-169.12
BALANCE	0.00
Monthly Service Charges	99.98
Usage Charges	14.23
Credits/Adjustments/Other Charges	7.55
Government Fees and Taxes	9.84
TOTAL CURRENT CHARGES	131.60
Due Jan 25, 2007	
Late fees assessed after Jan 25	
Total Amount Due \$131.60	

The Easiest Way to Pay Your Bill

Pay your Cingular bill automatically using the bank account, credit card or debit card of your choice. Enjoy peace of mind knowing that your bill will be paid on time with no checks, envelopes or stamps. Enrolling is easy - just go to www.cingular.com, Log in to My Cingular (or Register if you don't already have an account) and click on Sign Up for AutoPay to enroll.

9020 N. MAY AVE., #250 NYC
OKLAHOMA CITY, OK 73120

#BWNHHBD

Redacted

PETER SCHROECK

Redacted
SPRINGFIELD, NJ

Redacted

Return the portion below with payment
to Cingular Wireless only.

Account Number:	Redacted
Total Amount Due:	Redacted \$131.60
Amount Paid:	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

* Please do not send correspondence with payment.

Total Amount
Due by Jan 25, 2007

Please Make Check Payable To:

Cingular Wireless
P.O. Box 537113
Atlanta, GA 30353-7113



Page:
Billing Cycle Date:
Account Number:

58 of 58
12/03/06 - 01/02/07

Redacted

Review & pay your bill at cingular.com/mycingular

Manage all of your account needs online. It's secure, easy to use, and all yours. Log in and see for yourself at cingular.com/mycingular

NOTICE OF DISPUTE RESOLUTION AGREEMENT IN CONTRACT

We are pleased to advise you that Cingular has revised the **ARBITRATION CLAUSE** in our standard Wireless Service Agreement to make it even better for consumers. The revised arbitration clause can be found at www.cingular.com/disputeresolution. This revision is effective immediately.

One Time Checking Account Payment Authorization Agreement (for use with kiosk payment):
I authorize Cingular Wireless to pay my bill by debiting my bank account. I can cancel authorization by contacting an in-store sales person. If my bank rejects a payment, I may be charged a return fee.

Wireless AMBER Alerts

Sign up to receive Wireless AMBER Alerts at www.cingular.com/amberalerts or by sending a text message with up to 5 zip codes to the short code AMBER (i.e. send SUBSCRIBE 12345 to short code 26237). Customers capable of receiving text messages can receive these geographically specified alerts. There is no charge to sign up or to receive AMBER alerts. Normal airtime charges will apply if you place a call in response to an AMBER alert message.

EXHIBIT 3



Page: 1 of 70
 Billing Cycle Date: 01/03/07 - 02/02/07
 Account Number: Redacted

How To Contact Us:

- 1-800-331-0500 or 611 from your wireless phone
- For Deaf / Hard of Hearing Customers (TTY/TDD)
 1-866-241-6567

Wireless Numbers with Rollover

Redacted

Previous Balance	131.60
Payments Posted	-131.60
BALANCE	0.00
Monthly Service Charges	99.98
Usage Charges	17.07
Credits/Adjustments/Other Charges	12.65
Government Fees and Taxes	9.82
TOTAL CURRENT CHARGES	139.52
Due Feb 25, 2007	
Late fees assessed after Feb 25	
Total Amount Due \$139.52	

Cingular is now the new AT&T.

And, the best part is, you don't have to do anything. You'll keep the benefits you currently have as a Cingular customer plus, with the additional resources of the new AT&T, you'll get innovative new products and services that will offer you even greater value. You'll also get new ways to experience your world, whenever and wherever you go. If you have questions, please visit www.cingular.com/att.

9020 N. MAY AVE., #250 NYC
 OKLAHOMA CITY, OK 73120

#BWNHBD

Redacted

PETER SCHROECK
 Redacted
 SPRINGFIELD, NJ

Redacted

Return the portion below with payment
 to Cingular Wireless only.

Account Number:	Redacted
Total Amount Due:	\$139.52
Amount Paid:	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

* Please do not send correspondence with payment.

Total Amount
 Due by Feb 25, 2007

Please Make Check Payable To:

Cingular Wireless
 P.O. Box 537113
 Atlanta, GA 30353-7113

420

Redacted

02007020200000013952208



Page:
Billing Cycle Date:
Account Number:

70 of 70
01/03/07 - 02/02/07

Redacted

Push to Talk Pay Per Use

Now you can talk instantly with Push to Talk Pay Per Use for \$0.15 per minute. See who's available and start talking with the largest Push to Talk network coverage in America. Need a Push to Talk capable phone? Visit www.cingular.com or a retail store near you.

New International Roaming Rates

Your standard pay-per-use international roaming rates have changed. Please visit www.cingular.com/roaming-rates for details.

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EXHIBIT 4



Page:
Billing Cycle Date:
Account Number:

1 of 69
02/03/07 - 03/02/07

Redacted

How To Contact Us:

- 1-800-331-0500 or 611 from your wireless phone
- For Deaf / Hard of Hearing Customers (TTY/TDD)
1-866-241-6567

Wireless Numbers with Rollover

Redacted

Previous Balance	139.52
Payments Posted	-139.52
BALANCE	0.00
Monthly Service Charges	99.98
Usage Charges	7.10
Credits/Adjustments/Other Charges	4.91
Government Fees and Taxes	9.70
TOTAL CURRENT CHARGES	121.69
Due Mar 25, 2007	
Late fees assessed after Mar 25	
Total Amount Due \$121.69	

Cingular is now the new AT&T.

And, the best part is, you don't have to do anything. You'll keep the benefits you currently have as a Cingular customer plus, with the additional resources of the new AT&T, you'll get innovative new products and services that will offer you even greater value. You'll also get new ways to experience your world, whenever and wherever you go. If you have questions, please visit www.cingular.com/att.

9020 N. MAY AVE., #250 NYC
OKLAHOMA CITY, OK 73120

#BWNHHBD

Redacted

PETER SCHROECK

Redacted
SPRINGFIELD, NJ

Redacted

Return the portion below with payment
to Cingular Wireless only.

Account Number:	Redacted
Total Amount Due:	\$121.69
Amount Paid:	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

* Please do not send correspondence with payment.

Total Amount
Due by Mar 25, 2007

Please Make Check Payable To:

Cingular Wireless
P.O. Box 537113
Atlanta, GA 30353-7113



Page:
Billing Cycle Date:
Account Number:

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02/03/07 - 03/02/07

Redacted

Data Detail (Continued)											Redacted
User Name: PETER SCHROECK											
Rate Code: NF20=FT14NATPSECONDARY, NF22=FT14NATP1000RUMMUNW											
Rate Period (Pd.): P=Peak; N=Nights; W=Weekends											
Call To: ** = International Call Terminated To Mobile											
Feature: 1=PTT One-to-One event; A=Alternate Line; B=Direct Asst Call Complete; C=Call Waiting;											
d=Directory Assistance Call; D=Data Call; E=Extended Local Area; F=Call Forwarding; g=PTT Group event; G=2-N-1 Call;											
H=Group Mobile to Mobile Calls; I=Incoming Call; K=Fax Call; L=Expanded Calling; M=Mobile to Mobile; N=Off-Network;											
O=Auto Dropped Call Credit; P=Priority Access Service; V=V-VPN; R=Convert to Home; S=Shared Minutes;											
T=Three Way Calling; v=Voice Activated Dialing; W=Weekends; X=Fax Mailbox; Y=Voicemail Return Call											
Item	Day	Date	Time	To/From	Type	Msg/KB/ Min	Rate Code	Rate Pd	Fea- ture	In/ Out	Total Charge
2206		03/02	08:53AM		MTM Other	1 Msg	NF22		In		0.00
2207		03/02	09:41AM		MTM Other	1 Msg	NF22		In		0.00
2208		03/02	10:16AM		OTHER MOBILE TO	1 Msg	NF22		Out		0.00
2209		03/02	10:43AM		Redacted MTM Other	1 Msg	NF22		In		0.00
2210		03/02	01:19PM		MTM Other	1 Msg	NF22		In		0.00
2211		03/02	02:01PM		CINGULAR MOBILE	1 Msg	NF22		In		0.00
Subtotal of Msgs				0.00							
2212	Sat	02/03	11:25PM		Multimedia Mess	1 Msg	NF22		In		0.25
2213	Tue	02/06	10:43PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2214	Wed	02/07	02:28PM		Multimedia Mess	1 Msg	NF22		In		0.25
2215	Sat	02/10	08:58AM		Multimedia Mess	1 Msg	NF22		In		0.25
2216		02/10	05:01PM		Multimedia Mess	1 Msg	NF22		In		0.25
2217		02/10	06:29PM		Redacted Multimedia Mess	1 Msg	NF22		In		0.25
2218	Tue	02/13	11:31PM		Multimedia Mess	1 Msg	NF22		In		0.25
2219	Wed	02/14	12:33AM		Multimedia Mess	1 Msg	NF22		Out		0.25
2220	Sun	02/18	03:59PM		Multimedia Mess	1 Msg	NF22		In		0.25
2221	Tue	02/20	01:18AM		Multimedia Mess	1 Msg	NF22		Out		0.25
2222		02/20	01:20AM		Multimedia Mess	1 Msg	NF22		Out		0.25
2223		02/20	01:37AM		Multimedia Mess	1 Msg	NF22		Out		0.25
2224	Wed	02/21	01:16PM		Multimedia Mess	1 Msg	NF22		In		0.25
2225	Sun	02/25	08:18PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2226		02/25	08:23PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2227		02/25	08:28PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2228		02/25	08:35PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2229	Thu	03/01	09:30PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2230		03/01	09:44PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2231		03/01	09:54PM		Multimedia Mess	1 Msg	NF22		Out		0.25
2232		03/01	11:20PM		Multimedia Mess	1 Msg	NF22		In		0.25
Subtotal of Msgs				5.25							
Totals											

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